

**Federal Defenders
OF NEW YORK, INC.**

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Executive Director

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Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

BY ECF
Honorable Victor Marrero
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Sep

Request GRANTED.

The condition of curfew enforced by location monitoring is hereby removed.

SO ORDERED.

9/7/2022

DATE



VICTOR MARRERO, U.S.D.J.

**Re: United States v. Leonardo Bueno Coplin
22 Cr. 144 (VM)**

Dear Judge Marrero:

I write, without objection from Pretrial Services or the Government, to request that the Court modify Mr. Bueno-Coplin's bail conditions as follows:

1. Remove the condition of a curfew enforced by location monitoring.

On December 8, 2021, Mr. Bueno-Coplin was released on bond with the following conditions: a \$75,000 unsecured personal recognizance bond signed by 3 financially responsible persons; Pretrial Services supervision as directed: home detention with GPS monitoring; travel limited to SDNY/ENY and ED PA (and points in between for purposes of travel; surrender all travel documents; and continue or seek employment.

On May 27, 2022, the Court modified Mr. Bueno-Coplin's bail by replacing the condition of home detention with a curfew enforced by location monitoring and by permitting travel to the District of New Jersey for purposes of work.

Since his initial release nine months ago, Mr. Bueno-Coplin has fastidiously abided by his conditions of release. He remains employed full time as a house painter, and he has demonstrated that a curfew condition is not necessary to ensure his presence in court or to ensure the safety of the community.

Therefore, I respectfully request that the Court modify his bail conditions as requested.

Respectfully submitted,

/s/ Amy Gallicchio

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Cc: AUSA Thomas Burnett